

**FILED**

**SEP 22 2021**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

**U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS**

UNITED STATES OF AMERICA,

Plaintiff,

v.

FREDDIE CRAWFORD,

Defendant.

**4:21CR00521 RLW/NAB**

**INDICTMENT**

The Grand Jury charges that:

**A. Introduction**

At all times material to this indictment,

1. As described more fully herein, the defendant aided and abetted by others, known and unknown to the Grand Jury, used materially false and fraudulent checks to obtain property and money from stores "F.D." and "H.D."

2. F.D. was a national retail chain headquartered in Georgia. F.D., Store #217, was located in St. Louis County, Missouri, within the Eastern District of Missouri.

3. H.D. was a national retail chain headquartered in Georgia. H.D., Store #8994, was located in St. Louis County, Missouri, within the Eastern District of Missouri.

4. Individuals "C.C.," "N.P.," "M.C.," and "R.T." did not authorize the defendant, and others known and unknown to the Grand Jury, to pass in the Eastern District of Missouri and elsewhere, counterfeit checks bearing the names of "C.C.," "N.P.," "M.C.," and "R.T."

**COUNT ONE**  
**(Counterfeit Securities)**  
**18 U.S.C. § 513(a)**

5. The allegations set forth in paragraphs 1 through 4 of this Indictment are hereby re-alleged and incorporated by reference as if fully set forth again.

6. On or about July 20, 2019, within St. Louis County, in the Eastern District of Missouri, the defendant,

**FREDDIE CRAWFORD,**

being aided and abetted by others known and unknown to the Grand Jury, did knowingly utter and possess a counterfeited security of Bank of America, a financial institution which operates in and the activities of which affect interstate commerce, to wit, check #7012, which reflected a payment in the amount of \$455.89 to F.D., Store #217, and included the true routing number of US Bank, a true US Bank account number, and the name of C.C. as the account holder, with the intent to deceive another person and organization.

In violation of Title 18, United States Code, Sections 513(a) and 2.

**COUNT TWO**  
**(Counterfeit Securities)**  
**18 U.S.C. § 513(a)**

7. The allegations set forth in paragraphs 1 through 4 of this Indictment are hereby re-alleged and incorporated by reference as if fully set forth again.

8. On or about July 24, 2019, within St. Louis County, in the Eastern District of Missouri, the defendant,

**FREDDIE CRAWFORD,**

being aided and abetted by others known and unknown to the Grand Jury, did knowingly utter and possess a counterfeited security of US Bank, a financial institution which operates in and the activities of which affect interstate commerce, to wit, check #8024, which reflected a payment in the amount of \$405.09 to F.D., Store #217, and included the true routing number of US Bank, a fraudulent US Bank account number, and the name of C.C. as the account holder, with the intent to deceive another person and organization.

In violation of Title 18, United States Code, Sections 513(a) and 2.

**COUNT THREE**  
**(Counterfeit Securities)**  
**18 U.S.C. § 513(a)**

9. The allegations set forth in paragraphs 1 through 5 of this Indictment are hereby re-alleged and incorporated by reference as if fully set forth again.

10. On or about August 16, 2019, within St. Louis County, in the Eastern District of Missouri, the defendant,

**FREDDIE CRAWFORD,**

being aided and abetted by others known and unknown to the Grand Jury, did knowingly utter and possess a counterfeited security of US Bank, a financial institution which operates in and the activities of which affect interstate commerce, to wit, check #8025, which reflected payment in the amount of \$494.09 to F.D., Store #217, and included the true routing number of US Bank, a fraudulent US Bank account number, and the name of N.P. as the account holder, with the intent

to deceive another person and organization.

In violation of Title 18, United States Code, Sections 513(a) and 2.

**COUNT FOUR**  
**(Counterfeit Securities)**  
**18 U.S.C. § 513(a)**

11. The allegations set forth in paragraphs 1 through 5 of this Indictment are hereby re-alleged and incorporated by reference as if fully set forth again.

12. On or about September 3, 2019, within St. Louis County, in the Eastern District of Missouri, the defendant,

**FREDDIE CRAWFORD,**

being aided and abetted by others known and unknown to the Grand Jury, did knowingly utter and possess a counterfeited security of US Bank, a financial institution which operates in and the activities of which affect interstate commerce, to wit, check #8024, which reflected payment in the amount of \$468.88 to F.D., Store #217, and included the true routing number of St. John's Bank, a true St. John's Bank account number, and the name of M.C. as the account holder, with the intent to deceive another person and organization.

In violation of Title 18, United States Code, Sections 513(a) and 2.

**COUNT FIVE**  
**(Counterfeit Securities)**  
**18 U.S.C. § 513(a)**

13. The allegations set forth in paragraphs 1 through 5 of this Indictment are hereby re-alleged and incorporated by reference as if fully set forth again.

14. On or about September 3, 2019, within St. Louis County, in the Eastern District of Missouri, the defendant,

**FREDDIE CRAWFORD,**

being aided and abetted by others known and unknown to the Grand Jury, did knowingly utter and possess a counterfeited security of US Bank, a financial institution which operates in and the activities of which affect interstate commerce, to wit, check #8029, which reflected payment in the amount of \$478.19 to H.D., Store #8994, and included the true routing number of St. John's Bank, a true St. John's Bank account number, and the name of M.C. as the account holder, with the intent to deceive another person and organization.

In violation of Title 18, United States Code, Sections 513(a) and 2.

**COUNT SIX**  
**(Counterfeit Securities)**  
**18 U.S.C. § 513(a)**

15. The allegations set forth in paragraphs 1 through 5 of this Indictment are hereby re-alleged and incorporated by reference as if fully set forth again.

16. On or about September 5, 2019, within St. Louis County, in the Eastern District of Missouri, the defendant,

**FREDDIE CRAWFORD,**

being aided and abetted by others known and unknown to the Grand Jury, did knowingly utter and possess a counterfeited security of US Bank, a financial institution which operates in and the activities of which affect interstate commerce, to wit, check #8027, which reflected payment in the amount of \$461.55 to F.D., Store #217; and included the true routing number of US Bank, a fraudulent US Bank account number, and the name of M.C. as the account holder, with the intent to deceive another person and organization.

In violation of Title 18, United States Code, Sections 513(a) and 2.

**COUNT SEVEN**  
**(Counterfeit Securities)**  
**18 U.S.C. § 513(a)**

17. The allegations set forth in paragraphs 1 through 5 of this Indictment are hereby re-alleged and incorporated by reference as if fully set forth again.

18. On or about September 7, 2019, within St. Louis County, in the Eastern District of Missouri, the defendant,

**FREDDIE CRAWFORD,**

being aided and abetted by others known and unknown to the Grand Jury, did knowingly utter and possess a counterfeited security of Alliance Credit Union, a financial institution which operates in and the activities of which affect interstate commerce, to wit, check #3608, which reflected payment in the amount of \$460.77 to F.D., Store #217, the true routing number of Alliance Credit Union, and the name of R.T. as the account holder, with the intent to deceive another person and organization.

In violation of Title 18, United States Code, Sections 513(a) and 2.

**COUNT EIGHT**  
**(Identity Theft)**  
**18 U.S.C. § 1028**

19. The allegations contained in paragraphs 1 through 5 of the Indictment are re-alleged and incorporated by reference as fully set forth again.

20. On or about July 24, 2019, within St. Louis County, in the Eastern District of Missouri, and elsewhere, the defendant,

**FREDDIE CRAWFORD,**

did knowingly possess and use, without lawful authority, a means of identification of another

person, knowing that the means of identification belonged to another actual person, with the intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a felony under Missouri law, in that the defendant used a name belonging to C.C., with the intent to commit, or to aid or abet, and in connection with Forgery, an unlawful activity that constitutes a felony under Chapter 570, Revised Statute of Missouri, Section 570.090.

In violation of Title 18, United States Court, Sections 1028(a)(7) and 2.

A TRUE BILL.

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FOREPERSON

SAYLER A. FLEMING  
United States Attorney

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JENNIFER J. ROY #47203MO  
Assistant United States Attorney